

**REMARKS**

Claims 1, 4-6, 31-33 are pending in the above-identified application. Claims 1, 4-6, 31-32 were rejected. With this Amendment, claim 1 was amended. Accordingly, claims 1, 4-6, 31-33 are at issue in the above-identified application.

**35 U.S.C. § 102 Anticipation Rejection of Claims**

Claims 1, 4, and 6 were rejected under 35 U.S.C. § 102(a) as being anticipated by *Tatsumi et al.* (U.S. Patent No. 6,447,984 B1). Applicants respectfully traverse this rejection. Claim 5 was rejected under 35 U.S.C. § 103(a) as being unpatentable over *Tatsumi et al.* in view of *Lan et al.* (U.S. 2001/0048452 A1). Claims 31 and 32 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Tatsumi et al.* in view of *Matsumoto* (JP-2000263768 A). Applicants respectfully traverse these rejections.

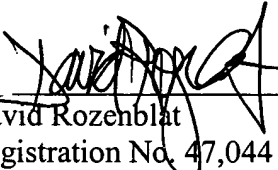
Amended claim 1, from which claims 4, 5 and 6 depend, recites a print head having ink-pressurizing cells, heating elements, and ink-ejection nozzles, the print head comprising *a plurality of substrate units*, each of which includes *a plurality of substrate members*, are provided for individually ejecting inks of different colors, and wherein the substrate members included in the substrate units are attached to a single nozzle formed member. *Tatsumi et al.* describes a liquid discharge head using comprising an orifice plate 302 having a plurality of orifices 301 that discharge ink, the head units 310a to 310d each arranged per color, which are bonded to the orifice plate 302 to supply ink to be discharged from each of the orifices 301, and the head unit inserting portion 321 where the head units 310a to 310d are inserted. Each head unit seems to correspond to one color. None of the above-cited references, either alone or in combination, teach or even suggest a print head having *a plurality of substrate units* each of which includes *a plurality of substrate members*, provided for individually ejecting inks of

different colors. At most, the references just illustrate a *single* head unit for each color whereas Claim 1 recites a *plurality* of substrate units each of which includes a *plurality* of substrate members, provided for individually ejecting inks of different colors. Therefore since each substrate unit contains a *plurality* of substrate members, a *plurality* of substrate members are used to eject an ink color. Accordingly, Applicants submit that the claimed invention is not anticipated by nor obvious over the applied references, either alone or in combination. Withdrawal of this rejection is respectfully requested.

In view of the foregoing, Applicants submit that the application is in condition for allowance. Notice to that effect is requested.

Respectfully submitted,

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By:   
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David Rozenblat  
Registration No. 47,044  
SONNENSCHNEIN NATH & ROSENTHAL LLP  
P.O. Box 061080  
Wacker Drive Station, Sears Tower  
Chicago, Illinois 60606-1080  
(312) 876-8000